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* NOT ADMITTED IN D.C.

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October 30, 1998

Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

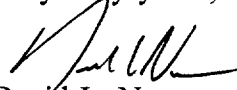
Re: Notice of Oral *Ex Parte* Presentation
CC Docket No. 94-129

Dear Ms. Salas:

On behalf of Skyline Telephone Membership Corporation, Yadkin Valley Telephone Membership Corporation and Bledsoe Telephone Cooperative, Inc. ("Rural LECs"), this notice is submitted in accordance with Section 1.1206(b)(2) of the Commission's Rules, with the original and one copy submitted to the Commission's Secretary.

On October 30, 1998, I attended, on behalf of the Rural LECs, a meeting with staff of the Commission's Common Carrier Bureau during which an oral *ex parte* presentation was made concerning the above-referenced rule making proceeding. The memorandum attached provides a summary of the presentation to the extent that the Rural LECs participated.

Very truly yours,


David L. Nace

cc: Dorothy Attwood, Common Carrier Bureau (w/enc., by hand)
Anita Y. Cheng, Common Carrier Bureau (w/enc., by hand)
Lisa C. Choi, Common Carrier Bureau (w/enc., by hand)
David Konuch, Common Carrier Bureau (w/enc., by hand)
Frank G. Lamancusa, Common Carrier Bureau (w/enc., by hand)
Jerusa Carl Wilson, Jr., MCI Telecommunications Corp. (w/enc. by mail)
David Cosson, Esq. (w/enc., by mail)

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MEMORANDUM

TO: Magalie Roman Salas, Secretary
Federal Communications Commission

FROM: David L. Nace, Attorney for Skyline Telephone Membership Corporation, Yadkin Valley Telephone Membership Corporation and Bledsoe Telephone Cooperative, Inc. *DN*

DATE: October 30, 1998

RE: CC Docket No. 94-129

This memorandum is submitted in compliance with Section 1.1206(b)(2) of the Commission's rules to summarize an oral *ex parte* communication to staff of the Commission's Common Carrier Bureau on October 30, 1998.

On behalf of Skyline Telephone Membership Corporation, Yadkin Valley Telephone Membership Corporation and Bledsoe Telephone Cooperative, Inc. ("Rural LECs"), I attended a meeting called by Commission staff and attended by representatives of MCI Telecommunications Corporation and of other local exchange carriers. The general subject of discussion was verification procedures employed by local exchange carriers to confirm notices of change of primary interexchange carrier ("PIC").

During the meeting, there was discussion of particular procedures employed by the Rural LECs to verify PIC change orders. I explained that the verification procedures conducted by the Rural LECs are conducted on a prompt and competitively neutral basis. The procedures have been effective, in the Rural LECs' experience, to minimize the incidence of "slamming" by interexchange carriers and to avoid unwarranted charges to Rural LEC customers for mistaken PIC change orders.

As discussed at the meeting, there are no Commission rules which preclude PIC change

verification by local exchange carriers. However, should the Commission determine that rules are needed to govern PIC change verification procedures, the Rural LECs suggest that the interests of the consumer are most effectively protected by rules which permit, but do not require, local exchange carriers to confirm PIC change orders in a prompt and competitively neutral manner.